

GLANSTEIN LLP

Counselors at Law

MEMO ENDORSED

711 Third Avenue – 17th Floor
New York, New York 10017
Tel: (212) 370-5100
Fax: (212) 697-6299

www.glansteinllp.com

September 6, 2023

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court – Southern District of New York
500 Pearl Street – Courtroom 17D
New York, NY 10007

Re: Defendants’ Letter Motion For Extension of Time To Produce Records and
To Adjourn Settlement Conference in *De Dios De Los Santos et al. v. Shree
Laxmi Restaurant, Inc. et al.* Case No. 22-CV-10774 (PAE)(KHP)

Dear Judge Parker:

This firm is counsel to the Defendants Shree Laxmi Restaurant Inc., d/b/a Swagat Restaurant, Abishek Sharma, and Lala R. Sharma (hereinafter “Defendants”) in the above referenced matter. Per your order yesterday afternoon directing production of the Individual Defendants Abishek Sharma’s and Lala R. Sharma’s (the “Individual Defendants”) personal tax returns in redacted form by 5:00pm, I again requested those documents from the Individual Defendants.

Unfortunately both Individual Defendants learned early yesterday that their uncle/brother in law in India had suffered a heart attack and was in critical condition in a hospital ICU there. Consequently, they were not able to attend to transmission of these records by yesterday afternoon or this morning.

Individual Defendant Lala R. Sharma is travelling to India this evening with his wife to address this serious family matter. He is expected to be there for at least the next two weeks, and will not be available to participate in today’s scheduled settlement conference starting at 2pm.

Given the above, Defendants hereby request that the court (1) extend their time to produce the Individual Defendants’ tax returns with appropriate redactions until Friday

September 22, 2023, and (2) adjourn today's Settlement Conference *sine die* until such time the Plaintiffs can examine these materials and the parties can have further settlement discussions among themselves. I note discovery in this case is presently scheduled to conclude on October 10, 2023, so this adjournment and new date for production of records will not change any other existing deadlines.

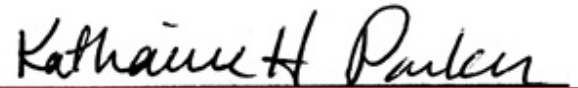
Plaintiffs' counsel have consented to the adjournment of today's settlement conference and to an extension of time for production of these records under the circumstances. This consent is granted with understanding that the additional records shall be provided at least two (2) weeks in advance of any rescheduled settlement conference.

Sincerely,

/s/ David M. Glanstein
David M. Glanstein

APPLICATION GRANTED: The Settlement Conference scheduled on Wednesday, September 6, 2023 at 2:00 p.m. in Courtroom 17-D, U.S. Courthouse, 500 Pearl Street, New York, NY is hereby rescheduled to Wednesday, December 6, 2023 at 10:00 a.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision-making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with my Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than November 29, 2023 by 5:00 p.m.

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

09/06/2023